

## **Regulatory Compliance Model**

### **Process Review and Measurement System**

**I. Introduction.** This model establishes a guide for ensuring conformance to NAVOSH requirements and standards. The steps of this model are: determine regulatory requirements, develop compliance strategies, identify and provide resources, execute the compliance strategy and monitor compliance status, and initiate improvement efforts.

Echelon 2's are required to provide guidance to subordinate activities for implementing PR&MS. CINCLANTFLT sent a letter to each echelon 3 that said "Do self-assessments and write improvement plans to support PR&MS." A simple questionnaire was included as an attachment that asked very general questions concerning the concepts and measures from the CNO PR&MS letter.

Did CINCLANTFLT meet the requirement? Yes. Did it provide guidance? Based upon the success of PR&MS to date, no. However, there was no follow up. We did require all activities to forward a copy of their self-assessment to us for our evaluation. It was determined none of the self-assessments met the process criteria nor what NOIU would accept for a program evaluation.

**II. Compliance Model Goals.** The primary goal of this model is to determine regulatory requirements, develop and implement strategies for compliance, and then develop a method to monitor effectiveness of strategies. Compliance includes: facilities and equipment (real property), work practices (job hazard analysis), workplace stressors (workplace monitoring), and administrative requirements. A secondary goal is to integrate OSH within the chain of command using requirements as the driver. There are several ways to accomplish this, and the best place to start may be with a checklist.

### **III. Process Steps.**

**A. Determine regulatory requirements-review mission of activity and determine what programs must be implemented:** review NAVOSH requirements, OSHA, NFPA, NEC, etc.

1. Workplace compliance: inspections, workplace requirements, training, mishap reporting, required programs such as fall protection, respiratory protection, etc., and the individual requirements within each program.

2. Administrative compliance: Though it may be considered a low priority with respect to the other areas, administrative requirements must be developed to support the OSH program across department lines. However, many activities spend too much time trying to meet administrative requirements.

(a) Where specifically required by NAVOSH or OSHA, do you have written instructions or guidelines?

(b) If Navy instructions or guidelines do not add value to your program, have you requested a waiver?

(c) Have you implemented administrative procedures or requirements, not required by higher command, that do not add value to the program, but require time to perform?

B. Develop strategies for program compliance: training programs, inspection programs, job hazard analyses, etc. and determine time frame/periodicity for performing strategies.

C. Identify and provide resources: safety staff requirements and qualifications, budget to support strategies, facility personnel assistance, medical assistance, IH assistance, etc.

D. Implement strategies.

F. Monitor progress: data analysis, compliance checklist for an initial review of each program, feedback from personnel, management, IH, medical, etc. Determine status of programs.

G. Develop plan of action and milestones (POA&M) for correction of problems identified or for improvement of programs. It not sufficient just to implement the improvement plan. Effects of the implementation must be assessed. So, develop a method to assess the effectiveness of correction or improvement actions. If original improvement plans or corrections are not effective, new ones must be developed, and then evaluated for effectiveness.

#### **IV. Performance measurement.**

A. One performance measure for this model cannot be developed. From a regulatory aspect, you are either in or out of compliance. As a result, the activity Self-Assessment is the key to regulatory compliance and must include performance measures within each program element. Reviewing other process models will provide supporting information and documentation that can be used to determine compliance and overall program effectiveness.

#### **V. Some suggested tools.**

A. The activity self-assessment.

B. The other four process models.

C. NAVOSH Program Checklist

VI. **Comments.** DO NOT make extra work for yourselves. The five models go together and should be used to compliment and support each other. State the information in one model and refer to it in the other (i.e. You state requirements for annual inspections in your self-assessment model. If you include inspections in the regulatory model instead of restating the information, just list it and state "refer to annual inspections in the self-assessment model.")

